

REMARKS

Reconsideration of this application is respectfully requested. Claim 11 has been amended. No claims have been canceled. Claims 21-24 have been added.

Claims 1 -20 are rejected under 35 U.S.C. 102(e) as being anticipated U.S. Patent No. 6,779,152 B1 by Conner et al. ("Conner"). Applicant respectfully reserves the right to swear behind the Conner reference at a later time.

With regards to claim 1, the Examiner states:

As to claim 1 ...Conner teaches the receipt of a request at the server requesting a web page...the execution of a program in response to client request to format HTML table for dynamic page that is being generated...the routine that generates HTML table...; and ...calling..the return of the page to the requesting browser

(Office Action dated September 20, 2004, pp. 2-3)

Claim 1 includes the following limitations:

1. A method of serving web pages from a server, said method comprising:  
accepting a request from a client computer system, said request specifying an address of a requested web page file;  
executing a program that manipulates an in-memory representation of said requested web page file to create a manipulated in-memory representation of said requested web page that contains dynamic content;  
calling a routine that generates a markup language document from said manipulated in-memory representation of said requested web page file; and  
returning said markup language document to said client computer system.

(emphasis added).

Conner describes “a table formatter that is useful in formatting a markup language page having dynamic data.” (col. 2, line 66 to col. 3, line 1) The table formatting system of Conner uses standard techniques such as “Sun Microsystems™’s JAVA™ Server Page™(JSP), Microsoft™’s Active Server Page™ (ASP), and the Extensible Style Sheet Language (XSL/XSLT) being promoted by the World Wide Web Consortium (W3C)..to..create web pages with dynamically-generated content” (col. 1, lines 39-54). After a web page with dynamically-generated content is prepared by standard techniques (e.g., JSP, ASP), Conner “convert[s] dynamic data into a formatted representation in which certain table cells are conditionally highlighted, and ...the table...contents...are independent of the table’s orientation” (col. 3, lines. 4-10). The formatting system of Conner may receive dynamic data prepared with standard techniques “from multiple sources to be sourced into the table format object” (col. 5, lines 42-43). However, Conner has nothing to do with creating interactive program functions for generating dynamic content, but rather uses a “table formatter” to format multi-sourced dynamic content generated with standard techniques.

For example, claim 1 includes at least the following limitations not disclosed, suggested, or taught in Conner “executing a program that manipulates an in-memory representation of said requested web page file to create a manipulated in-memory representation of said requested web page that contains dynamic content; calling a routine that generates a markup language document from said manipulated in- memory representation of said requested web page file; and returning said markup language document to said client computer system.” (Claim 1).

Given that claims 2-8 depend on claim 1, applicant submits that claims 2-8 are not anticipated by Conner.

With regards to claim 9, the Examiner states:

As to claim 9,...Conner teaches the generation of HTML tags which represent the starting and ending of an address of dynamic attribute...the dynamic table modification by a single line of code..; and .... the routine that generates HTML table and the return of the page to the requesting browser

(Office Action dated September 20, 2004, pp. 5-6)

Claim 9 includes the following limitations:

9. A method of serving web pages from a server, said method comprising:  
creating a modified mark-up language file for representing a web page appearance, said modified mark-up language file containing embedded identifier tags for identifying locations for dynamic content;  
creating interactive program functions for generating dynamic content, said interactive program functions for modifying sections of said in-memory representation of said mark-up language file associated with said identifier tags identifying locations for dynamic content; and  
deploying said modified mark-up language file and said interactive program functions to a server system wherein said server system that creates an in-memory representation of said mark-up language file, executes said interactive program functions to manipulate said in-memory representation of said mark-up language file to create a manipulated in-memory representation of said mark-up language file, and generates a web page from said manipulated in-memory representation of said mark-up language file.

(emphasis added).

Conner describes that “the page designer may specify how to convert” (col. 9, lines 29-30) dynamic data prepared using standard techniques (e.g., JSP) “into a formatted tabular representation in which certain table cells are conditionally highlighted based on the characteristics of the dynamic data to be presented in that cell” (col. 9, lines 31-34). Rather than generating dynamic content in sections of a webpage having indicators, Conner formats already generated dynamic data (e.g., generated using standard techniques such as JSP) into a table using “prefixes and suffixes” (col. 9, line 40) within the table. “Thus, for example, if the developer wants to make a given cell red, the prefix would be <font color=red> and the suffix would be </font>.” (col. 9, lines 43-45).

In other words, Conner merely “convert[s] dynamic data into a formatted representation in which certain table cells are conditionally highlighted, and ...the table...contents...are independent of the table’s orientation” (col. 3, lines. 4-10). Connor achieves conditional highlighting “by associating prefixes and suffixes” for individual cells in a table. Therefore, Conner has nothing to do with creating interactive program functions to generate dynamic content in sections of a web page associated with identifier tags, but rather formats a table having dynamic data using prefixes and suffixes in the table.

For example, claim 9 includes at least the following limitations not disclosed, suggested, or taught in Conner “creating a modified mark-up language file... file containing embedded identifier tags for identifying locations for dynamic content; creating interactive program functions for generating dynamic content, said interactive program functions for modifying sections of said in-memory representation of said mark-

up language file associated with said identifier tags identifying locations for dynamic content (Claim 9).

Given that claims 10-16 depend on claim 9, applicant submits that claims 10-16 are not anticipated by Conner.

With regards to claim 17, the Examiner states:

Claims 10 -20 do not teach or define any new limitations above claims 1- 9 and therefore are rejected under the same rationale.

(Office Action dated September 20, 2004, pg. 6)

Claim 17 includes the following limitations:

17. (Original) A computer server system for serving web pages, said computer server system comprising:  
a network connection to a computer network;  
a dynamic content program for manipulating an in-memory representation of a web page file to create a manipulated in-memory representation of said web page file that contains dynamic content; and  
a web server program, said web server program accepting a request from a client computer system through said network connection, said request specifying an address of said web page file, said web server program executing said dynamic content program to create said manipulated in-memory representation of said web page file, and said web server program returning a markup language document generated from said manipulated in-memory representation of said web page file to said client computer system.

(emphasis added).

Conner describes "a table formatter that is useful in formatting a markup language page having dynamic data." (col. 2, line 66 to col. 3, line 1) The table

formatting system of Conner uses standard techniques such as “Sun Microsystems™’s JAVA™ Server Page™(JSP), Microsoft™’s Active Server Page™ (ASP), and the Extensible Style Sheet Language (XSL/XSLT) being promoted by the World Wide Web Consortium (W3C)..to..create web pages with dynamically-generated content” (col. 1, lines 39-54). After a web page with dynamically-generated content is prepared by standard techniques (e.g., JSP, ASP), Conner “convert[s] dynamic data into a formatted representation in which certain table cells are conditionally highlighted, and ...the table...contents...are independent of the table’s orientation” (col. 3, lines. 4-10). The formatting system of Conner may receive dynamic data prepared with standard techniques “from multiple sources to be sourced into the table format object” (col. 5, lines 42-43). However, Conner has nothing to do with creating interactive program functions for generating dynamic content, but rather uses a “table formatter” to format multi-sourced dynamic content generated with standard techniques.

For example, claim 17 includes at least the following limitations not disclosed, suggested, or taught in Conner “a dynamic content program for manipulating an in-memory representation of a web page file to...dynamic content;....executing said dynamic content program to create said manipulated in-memory representation...web server program returning a markup language document generated from said manipulated in-memory representation of said web page file to said client computer system.” (Claim 17).

Given that claims 18-20 depend on claim 17, applicant submits that claims 18-20 are not anticipated by Conner.

#### New Claims

Applicant respectfully requests that the Examiner consider new claims 21-24.

Applicant respectfully submits that the new claims 21-24 do not add any new matter.

Applicant respectfully submits that new independent claims 21 and 23 are allowable at least because Conner does not disclose, teach, or suggest at least “A method of generating a dynamic content web page, comprising: applying at least one dynamic content identifier to a markup language file; and executing a program to generate dynamic content at a portion of the markup language file identified with the at least one dynamic content identifier, wherein the executing is performed without compiling the markup language file having the at least one dynamic content identifier.” (Claim 21, 23 emphasis added). Applicant respectfully submits that dependent claim 22 and 24 are allowable at least because it depends on an allowable independent claim.

**Conclusion**

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections and objections have been overcome. Applicant reserves all rights with respect to the applicability of the doctrine of equivalents. A petition for an extension of time is submitted with this amendment. If there are any additional charges, please charge them to our Deposit Account No. 02-2666. If the Examiner feels a telephone conversation would be helpful, then the Examiner is encouraged to call me at 408-720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: \_\_\_\_\_

2/17/05



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